

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WHITEMAN TO  
NATIONAL POSTAL POLICY COUNCIL INTERROGATORIES  
(NPPC/USPS-T2-1(A)-(B))  
(May 26, 2021)**

The United States Postal Service hereby provides the response of witness Curtis Whiteman to the following interrogatories of the National Postal Policy Council (NPPC) dated May 19, 2021: NPPC/USPS-T2-1(a)-(b). Each interrogatory is stated verbatim and followed by the relevant response.

The Postal Service believes that NPPC has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NPPC in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NPPC on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 26, 2021

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TO INTERROGATORIES OF NATIONAL POSTAL POLICY COUNCIL**

**NPPC/USPS-T2-1.** Please refer to Page 14, lines 2-3, of your testimony, where you state: "The output of the costing models shows an expected decrease in annual cost of \$279.6 million."

- a. Are the cost savings numbers of \$279.6 million as compared to an optimized baseline or a current state baseline?
- b. If the cost savings are against a current state baseline, did you perform any analysis showing what savings would be compared to an optimized current ground baseline? If so, please provide it.

**RESPONSE:**

- a. The \$279.6 million in cost savings was calculated using FY2020 costs as the baseline, which would be a current state baseline.
- b. No.